

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

IN RE:

Dolores Ann Walker,

Debtor.

No. 3:19-bk-33182-SHB

Chapter 13

Objecting Party: **Tobby Walker**

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

- ☐ 1. Debtor(s) not eligible for chapter 13 relief. 11 U.S.C. § 109(e) or (g)
- ☒ 2. Plan not proposed in good faith. 11 U.S.C. § 1325(a)(3)
- ☒ 3. Creditors receive less under the plan that they would receive in a chapter 7.
11 U.S.C. § 1325(a)(4)
- ☒ 4. Plan does not provide for payment of all disposable income. 11 U.S.C. §
1325(b)(1)(B)
- ☒ 5. The plan is not feasible. 11 U.S.C. § 1325(a)(6)
- ☐ 6. Unsecured claims are improperly classified or plan unfairly discriminates a
class. 11 U.S.C. § 1322(b)(1)
- ☐ 7. Plan improperly provides for lien avoidance.
- ☐ 8. Collateral is undervalued or all collateral not listed. 11 U.S.C. §
1325(a)(5)(B)(ii)
- ☐ 9. No interest provided on claim or interest rate is insufficient. 11 U.S.C. §
1325(a)(5)(B)(ii)
- ☐ 10. Lack of adequate protection, either in monthly payment on secured debt or
absence of insurance.
- ☐ 11. The plan does not permit a deficiency claim.
- ☐ 12. Security interest in principal residence is impermissibly modified, no
mortgage arrearage listed, or mortgage default is not cured within a reasonable
time. 11 U.S.C. § 1325(a)(5)

- _____ 13. The plan does not provide for lien retention for a secured claim. 11 U.S.C. § 1325(a)(5)(B)(i)
- X 14. Other: Debtor failed to disclose all monies received from transfer of real properties subject to lien in Grainger County Register of Deeds and per Order in Knox County Circuit Court, Division IV.

BERNSTEIN, STAIR & McADAMS LLP

By: /s/ W. Tyler Chastain
W. TYLER CHASTAIN (BPR #016029)
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Objection to Confirmation of Chapter 13 Plan has been served upon the following individuals by placing same in the U.S. Mail, postage prepaid (USM) or electronically (ECF):

Dolores Ann Walker (USM)
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This the 6th day of November 2019.

/s/ W. Tyler Chastain
W. TYLER CHASTAIN